

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

Postal Rate and Fee Changes, 1997 )

Docket No. R97-1

OFFICE OF THE CONSUMER ADVOCATE  
INTERROGATORIES TO UNITED STATES POSTAL SERVICE  
WITNESS PAUL M. LION  
(OCA/USPS-T24-10-19)  
July 23, 1997

Pursuant to sections 25 and 26 of the Rules of Practice of the Postal Rate Commission, the Office of the Consumer Advocate hereby submits interrogatories and requests for production of documents. Instructions included with OCA interrogatories 1-7 to the United States Postal Service dated July 16, 1997, are hereby incorporated by reference.

Respectfully submitted,



GAIL WILLETTE

Director

Office of the Consumer Advocate



SHELLEY S. DREIFUSS

Attorney

OCA/USPS-T24-10. Please refer to Table 1 from USPS-T-24, and Table 3 from USPS-T-4 in Docket No. MC96-3, below. Table X reflects the change in the number of post office boxes installed by box size and delivery group between Docket Nos. MC96-3 and R97-1.

<b>Table 1. Number of Boxes Installed (Survey Data)</b>						
<b>Box Size</b>	<b>City-A</b>	<b>City-B</b>	<b>City-other</b>	<b>Noncity</b>	<b>Nondelivery</b>	<b>Total</b>
<b>1</b>	35,535	58,079	4,211,964	3,564,918	976,251	8,846,747
<b>2</b>	1,987	16,525	2,030,453	1,544,572	357,141	3,950,678
<b>3</b>	1,162	5,899	719,650	409,758	89,322	1,225,791
<b>4</b>	118	1,154	170,699	35,142	7,807	214,920
<b>5</b>	51	747	40,705	6,674	3,985	52,162
<b>Total</b>	38,853	82,404	7,173,471	5,561,064	1,434,506	14,290,298

Source: Table 1, USPS-T-24, Docket No. R97-1

<b>Table 3 USPS T-4 Number of Post Office Boxes Installed (Survey)</b>					
	<b>I-A</b>	<b>I-B</b>	<b>I-C</b>	<b>II</b>	<b>Total</b>
<b>1</b>	35,535	55,529	4,071,571	4,684,112	8,846,747
<b>2</b>	1,987	15,428	1,964,539	1,968,724	3,950,678
<b>3</b>	1,162	5,531	700,489	518,609	1,225,791
<b>4</b>	118	1,064	167,433	46,305	214,920
<b>5</b>	51	739	40,228	11,144	52,162
<b>Total</b>	38,853	78,291	6,944,260	7,228,894	14,290,298

Source: Table 3, USPS-T-4, Docket No. MC96-3

<b>Table X</b> <b>Change in the Number of Post Office Boxes Installed by Box Size and Delivery Group</b>					
Box Size	Change				Check Col. Net Change
	City-A	City-B	City-other	Noncity	
	[1]	[2]	[3]	[4]	[5]=[1]+[2]+[3]+[4]
<b>1</b>	0	2,550	140,393	-1,119,194	-976,251
<b>2</b>	0	1,097	65,914	-424,152	-357,141
<b>3</b>	0	368	19,161	-108,851	-89,322
<b>4</b>	0	90	3,266	-11,163	-7,807
<b>5</b>	0	8	477	-4,470	-3,985
<b>TOTAL</b>	0	4,113	229,211	-1,667,830	-1,434,506

- a. Please confirm that the data on number of boxes installed in Tables 1 and 3 were obtained from the Post Office Box Study described on pages 3-13 of your testimony from Docket No. MC96-3. If you do not confirm, please explain.
- b. Please confirm that the change in the number of post office boxes installed by box size and delivery group, as shown in Table X, is correct. If you do not confirm, please explain and provide correct figures.
- c. Please refer to Table X. Please explain the reasons for, and the assumptions underlying, the change in the number of post office boxes by delivery group.
- d. Please refer to Table X. Please explain the reasons for, and the assumptions underlying, the change in the number of post office boxes by box size.
- e. Please identify any new or additional information used to develop the number of post office boxes installed for the Delivery Group entitled "Non-Delivery," shown in Table X.

OCA/USPS-T24-11. Please refer to your testimony at page 7, Table 3.

- a. Please explain the wide disparity between the number of post office boxes installed for the City-A Delivery Group as recorded in the Delivery Statistics File in April 1997 (DSF 97) and as reported in the Post Office Box Study.
- b. Table 3 shows the City-A Delivery Group with an expansion factor of 2.69, and the Non-city Delivery Group with an expansion factor of 1.26. Please explain why the City-A Delivery Group should have an expansion factor more than two times the expansion factor of the Non-city Delivery Group.

OCA/USPS-T24-12. Please refer to your testimony at page 5, Table 1, and page 7, lines 7-9. Please explain why you did not increase the number of boxes installed as shown in Table 1 by 1.2 percent to reflect the growth in the number of boxes installed between the two "DSF runs."

OCA/USPS-T24-13. Please refer to your testimony at page 6, and the excel file "Pobox97" and the sheet "Tables 1-3." Please show how the formulas

- (1)  $\text{Boxes in Use (97)} = \text{Boxes in Use (Survey 95)} * \text{Boxes Installed (DSF 97)} / \text{Boxes Installed (Survey 95)}$
- (2)  $\text{Boxes in Use (97)} = \text{Boxes in Use (DSF 97)} * \text{Boxes in Use (Survey 95)} / \text{Boxes Installed (Survey 95)}$

were used to estimate the Pre-MC96-3 boxes in use.

OCA/USPS-T24-14. Please refer to your testimony at page 6, lines 8-11. Please confirm that the number of customers ineligible for box service were estimated in the

Postal Service's response to POIR No. 4, Question 6, Docket No. MC96-3. If you do not confirm, please explain.

OCA/USPS-T24-15. Please refer to your testimony at page 9, Table 5.

- a. Please refer to columns two and three. Please explain the terms "Classified" and "Contract," and the origin and meaning of the corresponding percentages 94 and 6, respectively.
- b. Please refer to the last column, which shows the percent of customers ineligible for carrier delivery by Delivery Group (i.e., type of carrier delivery office). Please confirm that the 1 percent of customers ineligible for city delivery service would equate to 72,964 ( $0.01 * 7,296,367$  total boxes in Delivery Group IC) boxes from Docket No. MC96-3. If you do not confirm, please explain and provide the correct figure. Please show all calculations used to derive the correct figure, and provide citations to all figures used.
- c. Please refer to the last column, which shows the percent of customers ineligible for carrier delivery by Delivery Group (i.e., type of carrier delivery office). For the 2 percent of customers at "classified" non-city delivery offices, and the 90 percent of customers at "contract" non-city delivery offices, ineligible for carrier delivery service, please provide the number of boxes corresponding to the 2 and 90 percent from Docket No. MC96-3. Please show all calculations used and provide citations to all figures used.
- d. Please refer to the last column, which shows the percent of customers ineligible for carrier delivery by Delivery Group (i.e., type of carrier delivery office). For the

30 percent of customers at nondelivery offices ineligible for any carrier delivery service, please provide the number of boxes corresponding to the 30 percent from Docket No. MC96-3. Please show all calculations used and provide citations to all figures used.

OCA/USPS-T24-16. Please refer to LR-H-188 at page 1. Please explain the meaning of the existence of "records that had POB Survey data, but no DSF data."

OCA/USPS-T24-17. Please refer to the table on page 6 of LR-H-188, concerning the number of boxes installed.

- a. Please explain in detail what the figures represent in the row entitled "NA."
- b. Please explain in detail your rationale for summing the rows entitled "Nondelivery" and "NA" to compute the row entitled "Total Nondelivery."

OCA/USPS-T24-18. Please refer to the table on page 7 of LR-H-188, concerning the number of boxes in use.


- a. Please explain in detail what the figures represent in the row entitled "NA."
- b. Please explain in detail your rationale for summing the rows entitled "Nondelivery" and "NA" to compute the row entitled "Total Nondelivery."

OCA/USPS-T24-19. Please refer to the table on page 7 of LR-H-188, concerning the number of boxes in use.

- a. Please confirm that for the row entitled "NA" the total is 50,390. If you do not confirm, please explain.
- b. Please confirm that for the row entitled "NA" the total should be 79,338. If you do not confirm, please explain.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the rules of practice.

  
SHELLEY S. DREIFUSS  
Attorney

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July 23, 1997